

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF ALABAMA
NORTHERN DIVISION

DONALD BELL; KATRINA BELL,)	
)	
Plaintiffs,)	
)	
vs.)	CIVIL ACTION NO. 2:05 CV 658-T
)	
TRAVELERS PROPERTY CASUALTY)	
INSURANCE COMPANY,)	
)	
Defendant.)	

**STANDARD FIRE'S ITEMIZED ACCOUNTING IN RESPONSE TO
THIS COURT'S JANUARY 30, 2006 ORDER**

COMES NOW the defendant, The Standard Fire Insurance Company, incorrectly identified in the Plaintiffs' complaint as Travelers Property Casualty Company (hereinafter referred to as "Standard Fire"), and submits the following itemized accounting of time spent by Standard Fire's counsel in securing responses to their discovery requests, pursuant to this Court's January 30, 2006 Order:

<u>Date</u>	<u>Timekeeper</u>	<u>Time entry</u>	<u>Total time (in hours)</u>
12/12/05	Joel Isenberg	Careful review of Chris Sanspree's correspondence regarding objections to plaintiff's discovery and careful review of Standard Fire's responses to discovery for response to letter (.5); drafting detailed letter to Chris Sanspree regarding Standard Fire's objections (.8).	1.3
12/14/05	Joel Isenberg	Review notice of filing of discovery by plaintiff (.1); determine that discovery responses themselves were not served (.3).	.4
12/20/05	Miriam Belcher (paralegal)	Letter to Chris Sanspree again requesting his clients' initial disclosures and responses	.1

		to discovery requests (.1).	
1/6/06	Joel Isenberg	Careful review of documents produced by plaintiffs and discovery responses (1.5); correspondence to Chris Sanspree regarding insufficient discovery responses and motion to compel (.3).	1.8
1/25/06	Joel Isenberg	Telephone conversation with Mr. Sanspree's office regarding motion to compel (.1).	.1
1/26/06	Joel Isenberg	Drafting detailed motion to compel plaintiff's discovery responses and review of discovery responses and correspondence regarding same (2.6).	2.6
1/27/06	Joel Isenberg	Finalize motion to compel for filing with federal court in light of plaintiff's failure to respond to letter and telephone call (.6).	.6
			<hr/>
Total time incurred:			6.9 hours

To the extent that this Court determines that attorneys' fees are due to be awarded, Standard Fire respectfully requests that this Court set a reasonable hourly rate for said award.

Respectfully submitted,

s/ Joel S. Isenberg
Brenen G. Ely, 0366-E54B
Joel S. Isenberg, 8855-N76J
Attorneys for Defendant

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CERTIFICATE OF SERVICE

I do hereby certify that a true and accurate copy of the foregoing has been served on all parties of record by:

_____	Hand Delivery
_____	U. S. Mail
_____	Overnight Delivery
_____	Facsimile
<u> x </u>	E-File

on this the 6th day of February, 2006.

s/Joel S. Isenberg
OF COUNSEL

cc:

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